

Exhibit Q

Threatened and Endangered Species

**Carty Generating Station
October 2026**

Prepared for



Portland General Electric Company

Prepared by



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Acronyms and Abbreviations

AC	alternating current
ASC	Application for Site Certificate
BESS	battery energy storage system
Certificate Holder / PGE	Portland General Electric Company
CGS / Facility	Carty Generating Station
Council	Oregon Energy Facility Siting Council
GPS	Global Positioning System
kV	kilovolt
MW	megawatt
NLCD	National Land Cover Database
OAR	Oregon Administrative Rules
ODA	Oregon Department of Agriculture
ODFW	Oregon Department of Fish and Wildlife
ODOE	Oregon Department of Energy
OESA	Oregon Endangered Species Act
ORBIC	Oregon Biodiversity Information Center
RFA	Request for Amendment
WAGS	Washington ground squirrel

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1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment (RFA) 4 to the Site Certificate for the Carty Generating Station (CGS or Facility). The Facility is located approximately 13 miles southwest of Boardman, in Morrow County, Oregon. As currently approved, the Facility is capable of generating up to 450 megawatts (MW) from the natural gas-fueled combined-cycle unit (Unit 1).

In RFA 4, the Certificate Holder is proposing photovoltaic solar energy generation with approximately 200 MW alternating current (AC) of nominal and average generating capacity and BESS with the capability of storing up to 200 MW AC. The overall CGS additions proposed with RFA 4 (including the BESS) are referred to throughout this request as the Carty Solar Farm with proposed RFA 4 changes. The solar generation is proposed in two separate solar areas referred to as the Northern Solar Area, located north of the Carty Reservoir, and the Southern Solar Area, located south of the reservoir [see Figure 2 in RFA 4's Division 27 document (Request for Amendment 4 for the Carty Generating Station)].

Exhibit Q provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(q) in support of RFA 4. Analysis in this exhibit incorporates and/or relies on reference information, analysis, and findings found in the Application for Site Certificate (ASC), previous RFAs, and Oregon Department of Energy Final Orders to demonstrate that the Facility, as modified by RFA 4, continues to comply with applicable Site Certificate conditions and the standard in OAR 345-022-0070. OAR 345-022-0070 requires that:

To issue a site certificate, the Council, after consultation with appropriate state agencies, must find that:

(1) For plant species that the Oregon Department of Agriculture has listed as threatened or endangered under ORS 564.105(2), the design, construction and operation of the proposed facility, taking into account mitigation:

(a) Are consistent with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3); or

(b) If the Oregon Department of Agriculture has not adopted a protection and conservation program, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and

(2) For wildlife species that the Oregon Fish and Wildlife Commission has listed as threatened or endangered under ORS 496.172(2), the design, construction and operation of the proposed facility, taking into account mitigation, are not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

In the Final Orders for the original Site Certificate and previous RFAs, the Oregon Energy Facility Siting Council (Council) found that the CGS complies with the Threatened and Endangered Species

standard, with the inclusion of Site Certificate Conditions 10.1-10.21. No new conditions are needed for protection of listed species. Note that PGE is recommending modification of Conditions 10.7 and 10.14 to clarify requirements; this is intended as clarification and is not intended to materially change the original intent of the conditions (refer to Section 6.0 of the RFA 4's Division 27 document [Request for Amendment 4 for the Carty Generating Station]). Additionally PGE is recommending modification of conditions 10.4 and 10.5 to incorporate reference to Carty Solar Farm Habitat Mitigation Plan.

1.1 Analysis Area

The analysis area for the state-listed threatened and endangered species identified in Exhibit Q is defined as the Amended Site Boundary plus a 5-mile buffer, per OAR 345-001-0010(35)(a). The Amended Site Boundary is defined in detail in Section 4.1.1.2 of the RFA 4's Division 27 document (Request for Amendment 4 for the Carty Generating Station). The threatened and endangered species analysis area is shown on Figure Q-1.

As described below in Section 3.1, the desktop review in support of this exhibit was conducted for the entire threatened and endangered species analysis area. The field surveys in support of this exhibit were conducted across a smaller portion of the analysis area, referred to as the Biological Study Area, where permanent and temporary disturbance for RFA 4 is proposed and as required for compliance with field survey protocol (see Section 3.2). The Biological Study Area encompasses approximately 1,213 acres.

2.0 Agency Coordination

PGE has consulted with the Oregon Department of Fish and Wildlife (ODFW) regarding the appropriate protocols for documenting the presence of state sensitive species. AECOM is the consulting firm that conducted the 2023 biological surveys for the Carty Solar Farm with proposed RFA 4 changes described in this exhibit. Tetra Tech is the consulting firm that conducted the 2026 botanical surveys and prepared this exhibit and its attachments. A summary of this consultation process is provided below.

- April 17, 2023. PGE and AECOM held a meeting to discuss level of survey intensity within the former BCP areas, use of The Nature Conservancy data, and level of effort expected for other sensitive species surveys.
- April 20, 2023. AECOM met with ODFW biologists to review survey protocols and to visit active WAGS colonies.
- June 23, 2023. AECOM met with ODFW to obtain guidance on WAGS identification based on scat photos.
- December 1, 2023. PGE, AECOM, and Tetra Tech met with ODFW biologists to discuss the results of the 2023 biological surveys.

- January 16, 2024. PGE and Tetra Tech met with ODFW biologists to discuss habitat impacts and mitigation, as well as Site Certificate conditions.
- July 6, 2026. Tetra Tech coordinated with Oregon Department of Agriculture (ODA) prior to conducting surveys to verify the timing of surveys was appropriate to identify Lawrence's milkvetch.

3.0 Identification of Species – OAR 345-021-0010(1)(q)(A)

OAR 345-021-0010(1)(q) Information about threatened and endangered plant and animal species that may be affected by the proposed facility, providing evidence to support a finding by the Council as required by OAR 345-022-0070. The applicant must include:

OAR 345-021-0010(1)(q)(A) Based on appropriate literature and field study, identification of all threatened or endangered species listed under ORS 496.172(2) and ORS 564.105(2) that may be affected by the proposed facility.

State threatened and endangered plant and animal species that might be affected by the Carty Solar Farm with proposed RFA 4 changes were identified through an initial desktop review in 2011 (PGE 2011), in 2016 (PGE 2018), in 2022 (PGE 2022), in 2023 with the preliminary RFA 4, and in 2026 (Exhibit P, Attachment P-1, Botanical Survey Report). The desktop reviews in 2023 and 2026 were then followed by 2023 and 2026 field surveys within a portion of the analysis area as described below. All investigations within the analysis area determined that Lawrence's milkvetch (*Astragalus collinus var. laurentii*), a threatened species, is the only ODA listed plant species with potential to occur (AECOM 2023a and Tetra Tech 2026), and the Washington ground squirrel (*Urocitellus washingtoni*, WAGS), an endangered species, is the only wildlife species with the potential to occur.

3.1 Desktop Review

In 2023, Tetra Tech conducted a desktop review to verify and revise the status and occurrences of threatened and endangered species that were identified during other Council-permitting efforts for the Facility. Tetra Tech reviewed the results of a query to the Oregon Biodiversity Information Center (ORBIC), which provided locations of rare species and habitats within the analysis area (ORBIC 2023) as well as aerial imagery to identify suitable habitat for special status plants and wildlife. The ODFW list of threatened and endangered fish and wildlife species was reviewed to identify state-listed species with the potential to occur within the analysis area (ODFW 2021). ODA's list of threatened, endangered, and candidate plant species was also examined (ODA 2023).

Consistent with previous efforts, the 2023 desktop review resulted in the identification of two state-listed species as having potential to occur within the analysis area: the Washington ground squirrel (state endangered) and Lawrence's milkvetch (state threatened). This identification was based on the known range of the species, presence of suitable habitat in the analysis area, and known/historical occurrences within the analysis area from the ORBIC database (Table Q-1). The ORBIC database query returned a total of five records (two historical records and three verified

extant) for WAGS within the analysis area (Figure Q-2). No state-listed fish have the potential to occur within the analysis area (ORBIC 2023; StreamNet 2023).

Table Q-1. State Listed Species with Potential to Occur within the Analysis Area

Scientific Name ¹	Common Name	Federal Status ²	State Status	Occurrence within Analysis Area ³	Potential Habitat within Analysis Area ⁴
Mammals					
<i>Urocitellus washingtoni</i>	Washington ground squirrel	-	Endangered	Yes	Yes
Plants					
<i>Astragalus collinus var. laurentii</i>	Lawrence's milkvetch	SOC	Threatened	No	Yes
1. Species shown include only those that are listed as T&E species in Oregon. Oregon state sensitive species are addressed in Exhibit P. 2. SOC = Species of Concern 3. ORBIC 2023 4. Dewitz 2019					

3.1.1 Washington Ground Squirrel

The Washington ground squirrel is a small rodent associated with shrub-steppe habitat of the Columbia Basin Ecoregion (Verts and Carraway 1998). WAGS occur only in the Columbia Basin of eastern Washington and north-central Oregon. In Oregon, the species range extends from Umatilla County, west through Gilliam and Morrow counties, to the John Day River. Concern for the long-term viability of WAGS populations led to ODFW listing the species as endangered in January 2000. The desktop review of potential WAGS habitat within the analysis area included a review of the National Land Cover Database (NLCD; Dewitz 2019) and Natural Resources Conservation Service geographic information systems soil data (NRCS 2006). Areas considered unsuitable habitat for WAGS include active agricultural areas and developed areas. Suitable WAGS habitat consists of native shrub-steppe or grassland cover.

Current and potential threats to the continued survival of the species include habitat loss from the conversion of habitat to agricultural use, residential use, infrastructure project development and other forms of development; as well as habitat fragmentation, recreational shooting, genetic isolation and drift, predation, disease, drought and invasive weeds on forage quality and quantity (USFWS 2010).

3.1.2 Lawrence's Milkvetch

Lawrence's milkvetch is endemic to Oregon. It is a 4- to 20-inch tall tap-rooted perennial in the pea (*Fabaceae*) family that occupies sandy or rocky soils overlying basalt on dry slopes of the Columbia Plateau in northern Oregon and can be found at elevations ranging from 2,000 to 3,400 feet,

although the species has been reported at elevations as low as 400 feet. Lawrence's milkvetch blooms from May to August and develops pendulant seed pods from late May to August that are required for identification (ODA 2023). Current threats to Lawrence's milkvetch include habitat loss due to agricultural development, grazing, road maintenance activities, competition from exotic weeds, and seed predation by insects (ODA 2022).

3.2 Field Surveys

As described below, field surveys were conducted in 2023 and 2026 to evaluate the potential presence of the state-listed species within a portion of the analysis area where permanent and temporary disturbance is proposed as part of RFA 4.

3.2.1 Washington Ground Squirrel Surveys

Surveys to determine the presence and location of WAGS colonies were conducted by AECOM in April and May of 2023 within a portion of the analysis area. The methodology and procedures for the surveys were derived from the Status and Habitat Use of the Washington Ground Squirrel (*Spermophilus washintoni*) on State of Oregon Lands, South Boeing, Oregon in 1999 (Morgan and Nugent 1999). Survey methodology and procedures also followed ODFW's recommended and approved WAGS survey protocols for eastern Oregon.

WAGS surveys occurred in April and May 2023 within the portion of the Amended Site Boundary where permanent and temporary disturbance is proposed (the Biological Study Area; 1,213 acres), plus all suitable habitat within 1,000-foot (approximately 300 meters) of the Biological Study Area (WAGS Survey Area, Figure Q-2). This 1,000-foot buffer was included to cover typical shifts in seasonal home ranges of WAGS colonies that may be active directly outside the Biological Study Area and could shift inside the Biological Study Area in future years.

Note that all permanent and temporary disturbance associated with RFA 4 are proposed within the Biological Study Area; however, not all of the study area will be disturbed. Figure Q-2 shows that the northeast corner of the Biological Study Area is outside the Amended Site Boundary, as this specific area has been removed from consideration for permanent and temporary disturbance.

WAGS typically inhabit shrub-steppe and grassland habitats within the Oregon portion of the Columbia Plateau; therefore, the status of the dominant vegetation in the WAGS Survey Area was verified and updated and suitable habitat delineated using electronic tablets. Areas devoid of suitable habitat, riparian areas, and developed areas were omitted from the survey efforts. Furthermore, the status of active agricultural and developed areas identified during the desktop review were verified during surveys and updated in order to exclude them from field survey efforts.

Following the Morgan and Nugent (1999) protocol, as well as to comply with ODFW survey requirements, two phases of surveys were conducted to increase the likelihood of detecting the presence of the species within the WAGS Survey Area and prior to the species going into aestivation. The first phase of surveys occurred from April 19 through April 25, 2023. This survey phase corresponded with the time when juvenile squirrels emerge from the burrows and are most

active; as a result, alarm calls are most frequent (Morgan and Nugent 1999). The second phase of surveys occurred from May 22 through May 26, 2023. Although these surveys followed the same methods as the first phase, there were slight differences to allow for greater likelihood of detection. These modifications included orienting the transects 90-degrees to the first phase transects and approaching a potential borrow perpendicular to that of the first phase.

WAGS colonies were identified either auditorily (vocalizations), visually (observation of an individual or signs of fresh activity) or by identifying droppings (scat) associated with burrows. For the purposes of the survey, colonies were defined as the observation of one or more of these three observation types along with burrows of the appropriate size and shape for the species (Morgan and Nugent 1999). If a colony was identified, a sub-meter Global Positioning System (GPS) unit was used to record the location of the activity center and the colony boundary. Detailed survey methodology is described in the AECOM (2023b) survey report included as Attachment Q-1.

Since the 2023 AECOM surveys, PGE qualified biologist have also conducted WAGS surveys in areas with suitable habitat (e.g., exclude areas formerly occupied by Boardman Coal Plant features) following the same protocols outlined above.

3.2.2 Lawrence's Milkvetch Surveys

Surveys to categorize vegetation and habitat within a portion of the analysis area were conducted in April, May, and June 2023 (Exhibit P, Attachment P-1). Efforts to document the occurrence of Lawrence's milkvetch within the Biological Study Area took place during this period. In support of RFA 4, Tetra Tech botanists conducted 2026 botanical surveys when the target species, Lawrence's milkvetch, was expected to be identifiable (Exhibit P, Attachment P-1).

4.0 Occurrence and Potential Adverse Effects – OAR 345-021-0010(1)(q)(B)

OAR 345-021-0010(1)(q)(B) For each species identified under (A), a description of the nature, extent, locations and timing of its occurrence in the analysis area and how the facility might adversely affect it;

4.1 Washington Ground Squirrels

WAGS are listed as a state endangered species under the Oregon Endangered Species Act (OESA). The desktop review identified five ORBIC (2023) records for WAGS within the analysis area (Figure Q-2). Of the five occurrences within the analysis area, two are considered historical records and three are considered verified extant (existing) by ORBIC.

Surveys conducted in April and May 2023 confirmed the presence of three active colonies within the WAGS Survey Area. The first confirmed colony consisted of multiple burrows in big sage shrubland and was detected west of Tower Road and north and west of the Carty Generating

Station, Unit 1 natural gas-fired power plant. The second confirmed colony consisted of several burrows as well and was detected along a dirt access road at the northeast corner of the WAGS Survey Area. The third confirmed colony consisted of one burrow and was detected in rubber rabbitbrush shrubland east of the Carty Reservoir; this colony may extend east outside the WAGS Survey Area. The three WAGS colonies that were active during 2023 surveys are shown on Figure Q-3 as Category 1 habitat.¹ Category 1 habitat includes active WAGS colonies and their associated 785-foot buffers in suitable habitat. Note that PGE also obtained 2023 WAGS survey data from The Nature Conservancy for land adjacent to the WAGS Survey Area. There was one WAGS colony located south of the WAGS Survey Area, which informs the Category 2 habitat categorization shown on Figure Q-3. Surveys conducted by PGE biologist since 2023 show that the locations of burrows varied over the last 3 years, but were generally located in similar locations. Pre-construction surveys will provide up-to-date WAGS data for final construction considerations.

Potential adverse effects during construction and operation could result from vehicles and equipment causing injury or mortality to the species from collisions, particularly during the species' active aboveground season. Given that no construction or ground-disturbing activities would occur within Category 1 habitat associated with active colonies, the likelihood of vehicle collision is minimized.

Ground-disturbing activities that result in temporary and permanent loss and modification of unoccupied Category 2 habitat would cause decreased cover, decreased food availability, and reduce dispersal opportunities for WAGS. Category 2 WAGS habitat is identified as an additional 4,136-foot buffer of suitable ground squirrel habitat on Category 1 WAGS habitat, except where there are habitat barriers to dispersal. The fenced solar areas and associated temporary construction areas may pose a barrier to dispersal for WAGS. Although WAGS are likely to pass through or burrow under the perimeter fencing and utilize areas not occupied by permanent facilities, the presence of roads, solar modules, BESS, associated infrastructure and construction areas may cause WAGS to avoid the RFA 4 operational area altogether. Given the uncertainty of the functionality of habitat within the fenced areas and whether the fenced area would be a barrier to WAGS movement, all development within a fenced area is considered a permanent impact on habitat.

The temporary impacts (less than one year) to most Category 2 WAGS habitat will be minimal and short term due to the revegetation and noxious weed control measures described in the Draft Vegetation and Soil Management Plan (VSMP; Exhibit I, Attachment I-2). Temporary impacts to Category 2 sagebrush habitat will take longer than five years to recover as described in Exhibit P. Table Q-2 quantifies temporary and permanent impacts on Category 2 WAGS habitat.

¹ Category 1 habitat is considered irreplaceable, limited, and essential habitat and includes WAGS burrow complexes and adjacent habitat for WAGS survival; therefore, PGE will avoid impacts to Category 1 habitat based on results of current surveys at the time of construction (Site Certificate Conditions 10.7 and 10.14).

Table Q-2. Temporary and Permanent Impacts on Category 2 WAGS Habitat

Habitat Type	Temporary Impacts (Acres)¹	Permanent Impacts (Acres)¹
Big Sage Shrubland	0.3	15.3
Big Sage/Juniper Woodland	0.1	7.8
Broom Snakeweed Shrubland	0.9	126.6
Rabbitbrush Shrubland	2.5	5.2
TOTAL	3.8	154.9
Note: numbers may not sum correctly due to rounding. “-” means no impact while <1 means greater than zero but less than 0.5 acres impact.		

WAGS within and adjacent to the Amended Site Boundary may experience slightly increased raptor predation pressure as a result of increased perching and nesting structures provided by the 2-mile proposed aboveground collector line for the Carty Solar Farm with proposed RFA 4 changes. However, this effect does not appear to be large enough to cause long-term effects resulting in abandonment of colonies as thriving colonies have been found adjacent to existing transmission lines (Tetra Tech 2011, 2014).

4.2 Lawrence’s Milkvetch

Lawrence’s milkvetch is listed as a state threatened species under OESA. The desktop review revealed that the range of the species overlaps north-central Oregon in Morrow, Umatilla, Gilliam, and Sherman counties. However, no ORBIC (2023) records for Lawrence’s milkvetch were identified within the analysis area. Additionally, of the vegetation and habitat surveys conducted in 2023 and the botanical survey conducted in 2026, only two milkvetch species were present: woolypod milkvetch (*Astragalus purshii*) and stalked-pod milkvetch (*Astragalus sclerocarpus*). Lawrence’s milkvetch was not present during 2023 or 2026 surveys based on flower and fruit morphology and is not known to currently occur within the analysis area; no potential adverse effects to this species are anticipated.

5.0 Avoidance and Minimization – OAR 345-021-0010(1)(q)(C)

OAR 345-021-0010(1)(q)(C) For each species identified under (A), a description of measures proposed by the applicant, if any, to avoid or reduce adverse impact;

5.1 Washington Ground Squirrels

The Council has imposed numerous Site Certificate conditions (Condition 10.7, 10.14, 10.15, 10.16, 10.17, 10.18, and 10.20) to avoid and minimize potential direct and indirect impacts to WAGS and their habitat. The Certificate Holder will implement measures to avoid or reduce adverse impact to WAGS in compliance with these Site Certificate conditions as described below.

Based on the results of the 2023 WAGS survey, PGE sited infrastructure proposed with RFA 4 primarily on moderately to highly disturbed habitat in a relatively developed landscape in order to avoid active WAGS Category 1 habitat, consistent with Conditions 10.7 and 10.14. PGE also minimized impacts to Category 2 habitat where feasible.

The Certificate Holder will conduct pre-construction surveys at known WAGS colonies consistent with Conditions 10.7 and 10.14 and protocols approved by ODFW. The Certificate Holder will provide a written report of the surveys to ODOE and ODFW. Based on consultation with ODOE and ODFW, the Certificate Holder will implement appropriate measures to avoid impacts to WAGS and any Category 1 habitat.

During each year in which construction will occur, the boundaries of Category 1 WAGS habitat will be marked by a qualified professional biologist with high-visibility flagging or markers, consistent with Condition 10.14. Special emphasis will be placed on flagging areas where Category 1 WAGS buffers overlap existing roads to ensure no vehicles or construction equipment inadvertently travel off the roads and damage Category 1 habitat. No access road improvements or new access roads are proposed in Category 1 WAGS habitat. The Certificate Holder shall not begin construction until the identified boundaries of Category 1 WAGS habitat have been approved by ODOE.

Consistent with Condition 10.15, the Certificate Holder will enforce speed limits for personnel and contractors to minimize the risk of vehicle collisions with WAGS during construction and through operations and maintenance activities near Category 1 habitat. A speed limit of 20 miles per hour will be enforced throughout the CGS and, during the active squirrel season (February 1 to June 30), a speed limit of 10 miles per hour will be enforced from one hour before sunrise to one hour after sunset on private roads near known WAGS colonies. The Certificate Holder will ensure that all construction and operations personnel are instructed to watch out for and avoid WAGS and other wildlife while driving through CGS.

As described in Exhibit P and consistent with Condition 10.17, the Certificate Holder will provide environmental awareness training for all project personnel and construction contractors before such contractors or personnel enter the site to perform construction-related activities. The training program will discuss Washington ground squirrel issues as well as other environmental issues related to the Facility site, and include handouts with identification information and reporting procedures. Additional training sessions will be conducted as needed for personnel that start after the beginning of construction.

The Certificate Holder will immediately report to ODFW any new WAGS burrows that become established within 785 feet of the Amended Site Boundary (per Condition 10.20). If this occurs, the Certificate Holder will coordinate with ODFW to establish additional mitigation measures or to obtain an Incidental Take Permit, as appropriate.

5.2 Lawrence's Milkvetch

No state-listed plant species, including Lawrence's milkvetch, were observed during surveys in 2023 or 2026; thus, state-listed plants are not expected to be affected by the Carty Solar Farm with

proposed RFA 4 changes. Condition 10.14 requires pre-construction surveys for Lawrence's milkvetch because previously protocol level surveys had not been conducted. Since protocol level surveys were conducted in 2026 Condition 10.14 has been satisfied. If final design results in construction disturbances in areas not previously surveyed PGE will use a qualified professional biologist to conduct a pre-construction survey per Condition 10.14 for Lawrence's milkvetch within areas proposed for disturbance during construction based on final design. This pre-construction survey will occur during the blooming season (May through August). If the species is found, the Certificate Holder will install protection flagging around the plant population and avoid any ground disturbance within this zone, and its location will be presented on construction constraint maps showing restricted work areas.

6.0 Protection and Conservation Program

Compliance/Impacts – OAR 345-021-0010(1)(q)(D)

OAR 345-021-0010(1)(q)(D) For each plant species identified under (A), a description of how the proposed facility, including any mitigation measures, complies with the protection and conservation program, if any, that the Oregon Department of Agriculture has adopted under ORS 564.105(3);

There are no plant species with the potential to occur within the analysis area for which ODA has adopted a protection and conservation program. As a result, the Carty Solar Farm with proposed RFA 4 changes will not impact any of ODA's recovery efforts, nor will the Carty Solar Farm with proposed RFA 4 changes cause a significant reduction in the likelihood of survival or recovery of plants with a protection or conservation program under ORS 564.105(3).

7.0 Potential Impacts to Plants, Including Mitigation Measures

– OAR 345-021-0010(1)(q)(E)

OAR 345-021-0010(1)(q)(E) For each plant species identified under paragraph (A), if the Oregon Department of Agriculture has not adopted a protection and conservation program under ORS 564.105(3), a description of significant potential impacts of the proposed facility on the continued existence of the species and on the critical habitat of such species and evidence that the proposed facility, including any mitigation measures, is not likely to cause a significant reduction in the likelihood of survival or recovery of the species.

No state-listed plant species are known to occur within the analysis area; therefore, the Carty Solar Farm with proposed RFA 4 changes is not likely to cause a significant reduction in the likelihood of survival or recovery of any state listed or candidate plant species.

8.0 Potential Impacts to Animals, Including Mitigation Measures – OAR 345-021-0010(1)(q)(F)

OAR 345-021-0010(1)(q)(F) For each animal species identified under (A), a description of significant potential impacts of the proposed facility on the continued existence of such species and on the critical habitat of such species and evidence that the proposed facility, including any mitigation measures, is not likely to cause a significant reduction in the likelihood of survival or recovery of the species; and

The Certificate Holder will avoid impacts to WAGS colonies and associated Category 1 WAGS habitat identified during pre-construction surveys, as previously described in Section 5.1. Per Conditions 10.1, 10.2, and 10.3, Certificate Holder will consult with ODFW and ODOE to finalize the Habitat Mitigation Plan (Exhibit P, Attachment P-4), including agreement on the total acreage of WAGS mitigation required. PGE will acquire the legal right to a habitat mitigation area where habitat enhancement actions and monitoring will take place to account for the mitigation needs for the temporary and permanent impacts on WAGS from the Carty Solar Farm with proposed RFA 4 changes.

As a result, construction, operation, and maintenance of the Carty Solar Farm with proposed RFA 4 changes is not expected to result in a significant reduction in the likelihood of survival or recovery of WAGS.

9.0 Monitoring – OAR 345-021-0010(1)(q)(G)

OAR 345-021-0010(1)(q)(G) The applicant's proposed monitoring program, if any, for impacts to threatened and endangered species.

The Certificate Holder will conduct pre-construction surveys to determine if the boundaries of WAGS colonies that were mapped during the 2023 surveys and subsequent PGE surveys are still in the vicinity of the proposed disturbance for the Carty Solar Farm with proposed RFA 4 changes. Consistent with Condition 10.14, these surveys will be conducted in the active squirrel season (February 1 to June 30) at least once every three years in suitable habitat until the beginning of construction. The surveys will encompass all areas of suitable habitat where permanent components will be located or where construction disturbance could occur. The Certificate Holder will provide written reports of the surveys to the ODOE and ODFW and will identify the boundaries of Category 1 WAGS habitat. In addition, the Certificate Holder will continue to implement a WAGS post-construction monitoring program consistent with Condition 10.21 and as described in the Amended Wildlife and Habitat Monitoring and Mitigation Plan (Exhibit P, Attachment P-3). Monitoring will include returning to known colonies in the vicinity of Carty Solar Farm with proposed RFA 4 changes impact areas to determine occupancy and the extent of each colony over time.

10.0 Conclusion

The Certificate Holder will comply with the following conditions related to threatened or endangered species from the Third Amended Site Certificate: Conditions 10.7, 10.14, 10.15, 10.16, 10.18, 10.20 and 10.21 (Council 2022). The Certificate Holder proposes revisions to Conditions 10.7, 10.14, and 10.15 to clarify requirements; this is intended as clarification and is not intended to materially change the original intent of the conditions (refer to Section 6.0 of the RFA 4's Division 27 document [Request for Amendment 4 for the Carty Generating Station]). Based on the information provided above, the Council may conclude that the Carty Solar Farm with proposed RFA 4 changes will not cause a significant reduction in the likelihood of survival or recovery of state-listed threatened or endangered plant and animal species and therefore meets the Threatened and Endangered Species standard under OAR 345-022-0070.

11.0 References

- AECOM (AECOM Technical Service Inc.). 2023a. Portland General Electric Carty Generating Station Solar Farm: Biological Resources Survey Report. Submitted by AECOM, Portland, Oregon, to Portland General Electric, Portland, Oregon.
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Figures

(Figure Q-2 is **Confidential** and provided under separate cover)

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Carty Generating Station Request for Amendment 4

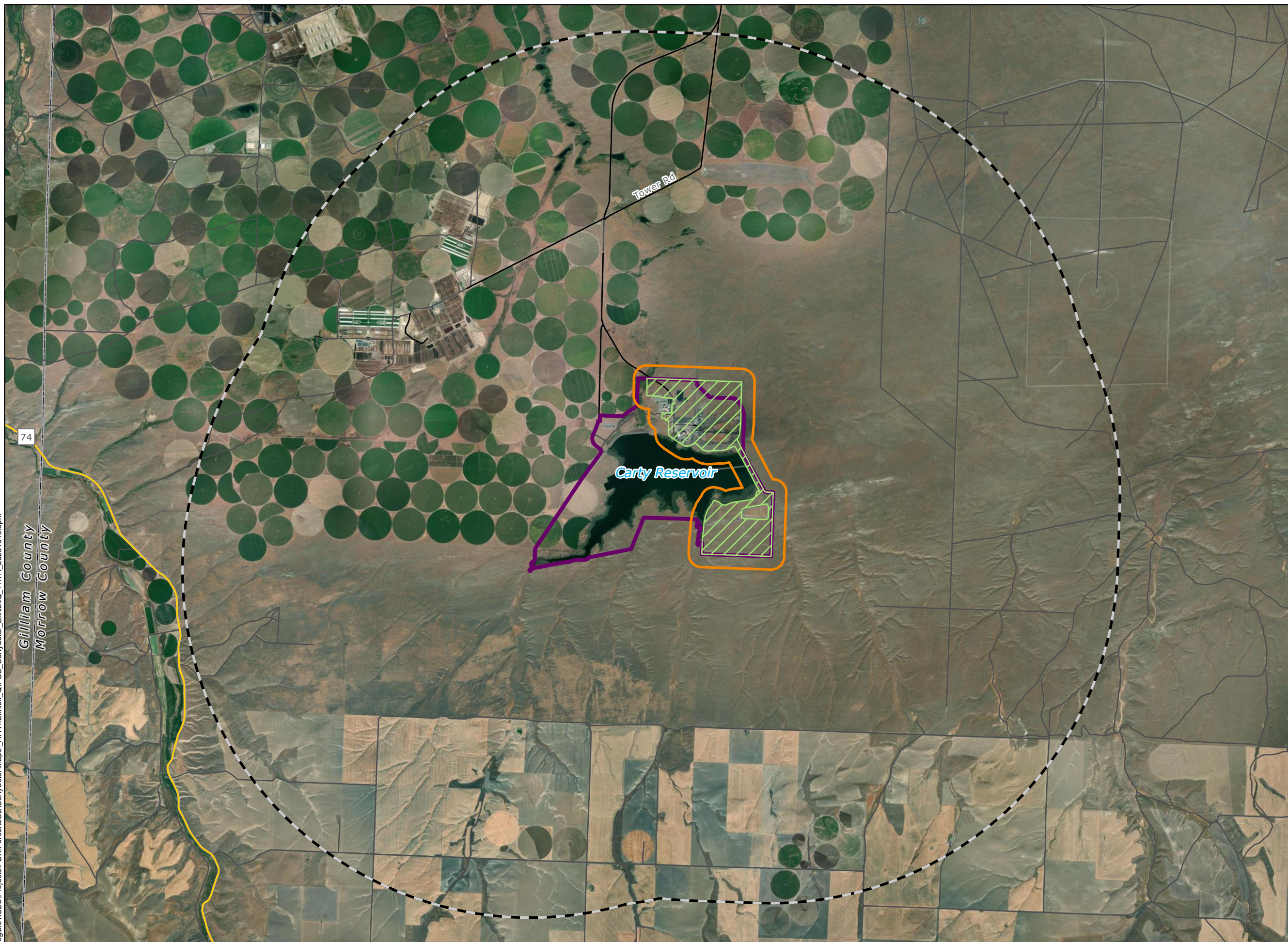
Figure Q-1 Analysis Area for Threatened and Endangered Species

MORROW COUNTY, OR

-  Amended Site Boundary
-  Analysis Area (5-mile Buffer)
-  County Boundary
-  State Highway
-  Local Roads
-  Biological Study Area
-  WAGS Study Area (1,000 foot Offset from Study Area)



Reference Map



1:85,000

WGS 1984 UTM Zone 11N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

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Carty Generating Station Request for Amendment 4

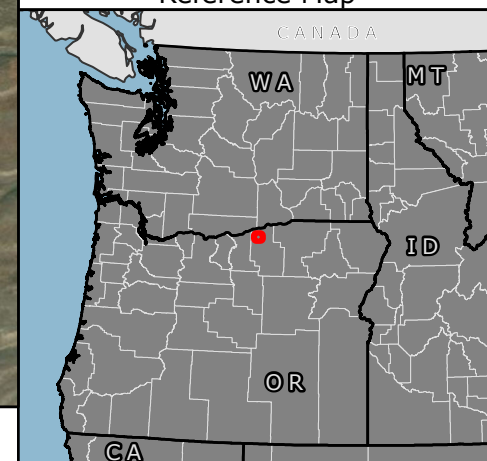
Figure Q-3 Washington Ground Squirrel Colonies Observed During 2023 Surveys

MORROW COUNTY, OR

- Amended Site Boundary
- Local Roads
- WAGS Study Area (1,000 foot Offset from Study Area)
- Category 1 Habitat Buffer (785 feet) around WAGS Colonies
- Category 2 Habitat Buffer (1,500 meter) around WAGS Colonies
- Category 6 Habitat



Reference Map

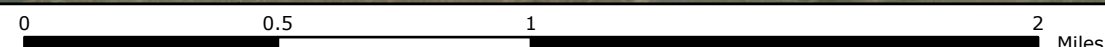


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Attachment Q-1. Washington Ground Squirrel Survey Report (November 2023)

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